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August 7, 2024

## **VIA ECF**

Honorable J. Paul Oetken United States District Court Southern District of New York 40 Foley Square, Room 2101 New York, New York 10007

Re: Peters Gallery v. Weiant, Case No. 23-CV-3181 (JPO)

Dear Judge Oetken,

We write on behalf of Joan Weiant and Leigh Brenza (the "Eberstadt Family") jointly with Peters Gallery of New York and Gerald Peters (together, "Peters") to respectfully request brief adjournments of the deadlines for the completion of expert-discovery and summary-judgment motions now that fact discovery is substantially complete.

## I. Expert Discovery

The parties jointly request an adjournment of the expert-discovery deadline, including related interim deadlines, from August 9 to September 16, 2024, to accommodate travel plans and other scheduling conflicts of Defendants' counsel and experts and the Plaintiff's pending motion to amend its answer to counterclaims. The Court granted two prior joint requests to extend the original May 20, 2024, expert discovery deadline. (Dkt. Nos. 35, 43.) No proposed adjournment will interfere with any scheduled Court conferences.

## **II.** Summary-Judgment Motions

In light of the proposed brief adjournment to complete expert discovery, the parties jointly request that the deadline for summary-judgment motions be adjourned from September 20, 2024, to October 30, 2024. The Court granted two prior requests to extend the original deadline, *i.e.*, 14 days following the close of all discovery (Dkt. Nos. 35, 43), and this proposed adjournment will not interfere with any scheduled Court conferences.

## III. Trial

The parties jointly request that the trial-ready deadline (if no motions for summary judgment are filed) be adjourned to December 4, 2024. The Court has granted two previous adjournments from the original deadline of July 3, 2024 (Dkt. Nos. 35, 43), and this proposed adjournment will not interfere with any scheduled Court conferences.

Case 1:23-cv-03181-JPO Document 52 Filed 08/07/24 Page 2 of 2

Peters Gallery v. Weiant, Case No. 23-CV-3181 (JPO)

August 7, 2024 Page 2 of 2

Respectfully submitted,

Judd B. Grossman

cc: All Counsel via ECF